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December 11, 2020

Via ECF

Honorable Andrew L. Carter, Jr.
United States District Judge
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square – Courtroom 1306
New York, New York 10007

MEMO ENDORSED

Re: Kiran Vuppala v. J.P.G. LLC
and 569 Hudson LLC
United States District Court
Southern District of New York
Case No. 19-cv-04233-ALC

Honorable Judge Carter:

This firm represents Defendant 569 Hudson LLC (“569 Hudson”) in the above-referenced matter. We are writing this joint letter on behalf of 569 Hudson, Defendant J.P.G. LLC (“JPG”) (collectively “Defendants”), and Plaintiff, with the consent of JPG’s counsel and Plaintiff’s counsel, respectfully to request a further sixty (60) day stay of the action.

This is the seventh request for an extension of the stay: the first two by Plaintiff’s counsel and the next four by joint request of all counsel. The first request was by a letter motion dated and filed on March 17, 2020 [ECF #31], which the Court granted by Memo Order dated and filed on March 19, 2020 [ECF #32]. The second request was by a letter motion dated and filed on April 17, 2020 [ECF #33], which the Court granted by Memo Order dated and filed on April 20, 2020 [ECF #34]. The third request was by a joint letter motion dated and filed on May 14, 2020 [ECF #35], which the Court granted by Memo Order dated and filed on May 18, 2020 [ECF #36]. The fourth request was by a joint letter motion dated and filed on June 15, 2020 [ECF #37], which the Court granted by Memo Order dated and filed on June 16, 2020 [ECF #38]. The fifth request was by joint letter motion dated and filed August 14, 2020 [ECF #39], which the Court granted by Memo Order dated and filed August 17, 2020 [ECF #40]. The sixth

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request was by a joint letter motion dated and filed October 15, 2020 [ECF #42], which the Court granted by Memo Order dated and entered October 16, 2020 [ECF #43].

In the October 16th Order, the Court stated that no further stays would be granted absent good cause shown. The parties appreciate the Court having granted numerous stays. Since the last joint letter motion was granted, the restaurant owned by JPG has closed permanently and vacated the premises. This change in circumstance affects numerous procedural and substantive aspects of the case, as well as any settlement proposals that might have been discussed, which the parties and their counsel would like to have some time to discuss and determine how to proceed.

Counsel for the parties respectfully suggest that the restaurant's closure and the need for time to determine how to proceed with the case and or resolve the issues furnishes cause for an additional sixty (60) day stay.

This request does not interfere with any other scheduled dates, except that by Order dated and filed December 8, 2020 [ECF #44], the Court directed the parties to submit a joint status letter by December 15, 2020. In the event the Court grants the stay, the parties respectfully request that the Court also extend the status letter deadline.

Wherefore, the parties jointly request that the Court grant the extension of the stay of the action for an additional sixty (60) days.

Respectfully submitted,

JEFFREY C. CHANCAS

JCC

It is hereby ORDERED that an additional 60-day stay is GRANTED. As this is the fifth joint request for a stay (seventh request in total) no further stays will be granted absent good cause shown. The parties are hereby ORDERED to file the previously requested joint status report by no later than February 15, 2020.

SO ORDERED:
Andrew L. Carter, Jr.

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE
Dated: December 14, 2020